

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
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VIA ECF

November 4, 2019

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Pursuant to this Court's Individual Practices in Civil Cases III.e., the Plaintiffs Executive Committees file this letter motion for oral argument of all of Plaintiffs' currently pending motions to compel the Federal Bureau of Investigation to produce documents.

Plaintiffs previously wrote the Court on July 11, 2019, requesting oral argument of Plaintiffs' Initial Motion to Compel the Federal Bureau of Investigation to Produce Documents From its Investigation of Saudi Government Officials' Assistance to the 9/11 Hijackers. Last Friday, November 1, 2019, the Plaintiffs and the FBI completed briefing of two additional motions: (1) Plaintiffs' Motion to Compel production of the FBI's 2012 Summary Report, as to which the government asserted the state secrets doctrine, and (2) Plaintiffs Motion to Compel production of FBI Discovery of the Third "Main Subject." Courtesy copies of the papers on both of those motions were provided to the Court earlier today.

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Plaintiffs believe that oral argument of all the pending motions would be of assistance to the Court, as well as the government and the Plaintiffs, because the motions raise important and unique issues of law and fact, and the record is substantial and complex.

Respectfully submitted,

COZEN O'CONNOR

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MDL 1570 Plaintiffs' Exec. Committee
for Commercial Claims

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/s/ Robert T. Haefele, Esquire

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

cc: All Counsel via ECF
Sarah Normand, Esq. (by email)
Jeannette Vargas, Esq. (by email)